



*United States Attorney  
Eastern District of New York*

MKP/TH/KMT

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December 7, 2018

By Hand and ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (S-1) (NGG) (VMS)

Dear Judge Garaufis:

The government respectfully submits this letter to request an extension to December 17, 2018—one business day—to respond to the pretrial motions filed by defendants Keith Raniere, Clare Bronfman, Allison Mack, Kathy Russell, Lauren Salzman and Nancy Salzman (the “Defense Pretrial Motions”). (See ECF Docket Nos. 192-200.) Counsel for defendants do not object to this request, provided that the deadline for any replies is extended to December 28, 2018.

In addition, pursuant to Rule IV(C) of the Court’s Individual Rules, the government respectfully requests permission to file an oversized memorandum of law in opposition to the Defense Pretrial Motions. The memoranda in support of the Defense

Pretrial Motions consist of over 115 pages of briefing. The government requests permission to file a single brief, consisting of no more than 80 pages, in opposition to all of the defendants' motions.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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cc: Counsel of record (by ECF)  
Clerk of Court (NGG) (by ECF)